

To help Examiner understand the patentable difference between claim 1 and the teachings of the applied references, Applicant expounds as follows.

Claim 1 defines a combination including:

"a gas discharge lamp" and

"an electronic switching device" characterized by

1. "having ... two transistors series-connected between a pair of device terminals",

2. "conducting current in a periodic manner between its device terminals", and

3. "having ... negligible voltage drop between its device terminals when indeed conducting current".

Zansky suggests nothing like this combination;

Schreiner suggests nothing like this combination;

Rambert suggests nothing like this combination;

Baker suggest nothing like this combination; and

Newcomb suggests nothing like this combination.

Of the applied references, each of three (Rambert, Baker, Newcomb) discloses "two transistors series-connected between a pair of device terminals".

However, neither Rambert, nor Baker, nor Newcomb, nor any of the other applied references provides even a slight hint of a possible benefit associated with replacing one of the switching transistors in Zansky with "two [simultaneously-conducting] transistors series-connected between a pair of device terminals". Thus, absent clear suggestion of benefit, there would be no reason for a skilled artisan to modify the teachings of Zansky by incorporating thereinto certain parts of Rambert, Baker or Newcomb.

In supporting his position, Examiner states that:

"The "motivation" being that one of ordinary skill knew how to provide inverter switches as claimed and the application of this knowledge, in accordance with the claims, was part of his understanding of providing any loads with any power".

In response to Examiner's not-too-clearly-stated position, Applicant points out that knowing how to do something has nothing to do with having a motivation to actually do so.

Applicant is willing to stipulate that a skilled artisan would have known how to attain the structure defined by Applicant's claimed invention. However, Examiner has not provided even a shred of evidence to the effect that this skilled artisan would have been motivated to actually do so.

Also, Examiner should note that neither Rambert, nor Baker, nor Newcomb mentions anything to the effect that their teachings might have benefit in electronic ballasts.

Now, if Examiner were to continue to maintain that there is some benefit associated with applying the teachings of Rambers, Baker or Newcomb to the teachings of Zansky, he is requested to point out exactly where in the applied references such benefit is described or suggested.

(b) Exemplary claim 3 includes:

"an inverter connected in circuit between [certain] the DC terminals" ... "between which exists a pulsating DC supply voltage having an instantaneoue absolute magnitude ... equal to that of a sinusoidal voltage".

This feature is neither described nor suggested by any of the applied references.

If Examiner were to remain of a contrary opinion, he is requested to point out exactly where and/or how the applied references suggest this feature.

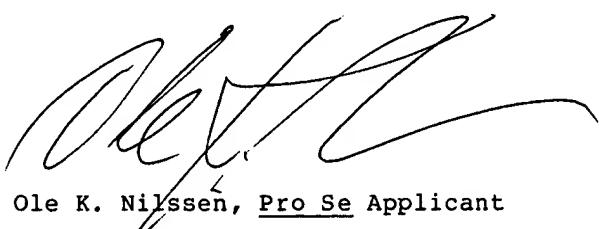
(c) Exemplary claim 15 includes:

"ballasting means ... including ... a first switching device having two transistors series-connected between a first pair of device terminals ... [and] ... a second switching device having two transistors series-connected between a second pair of device terminals ... [and] ... having a substantially sinusoidal voltage existing between one of the first device terminals and one of the second device terminals".

This feature is neither described nor suggested by any of the applied references.

If Examiner were to remain of a contrary opinion, he is requested to point out exactly where and/or how the applied references suggest this feature.

(d) Etc., etc.



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